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Comments on the B/D program purpose and need statement (draft 1/96)  
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General reaction:

Most bases are covered, but in so general a fashion that there's no way to distinguish the Program from other efforts. Although purpose and need statements are often brief, in this instance consider providing substantial background detail on the key problems (i.e., expand the need section) and program objectives (purpose).

Ecosystem quality:

p.5/6 Comments are focused on sustainable populations of fish without explicit statement that they must also be capable of supporting recreational and commercial harvest of game species.

This section says that the ecosystem does not provide sufficient quality habitats, but there is no recognition that flows are a component of habitat. This should be explicit.

With respect to "improve and increase aquatic habitats," is it the intent (geographic scope notwithstanding) to focus on habitats in the estuary?? If so, as currently written, it's not clear. As it stands, the wording "production and survival of native and other desirable estuarine and anadromous fish in the estuary" is confusing because production and survival of anadromous fish doesn't depend solely on the estuary, although they need certain conditions while in the estuary.

*Slight rewording: Improve and increase aquatic habitats in the estuary so that they can support the sustainable projection... and anadromous fish.*

There's no parallel objective for terrestrial habitats (unless intent is to limit to wetlands-- but is this entirely appropriate? or is this one of the lines drawn between the Program and other plans/programs?).

Water supply reliability:

Separate the the first element of bullet #1 from the second:  
"Reduce the conflict between beneficial users."

Query: uses or users. How do environmental water uses factor in? do fish stand as users? (As users, or uses, will fish and other aquatic species be allowed projected increases in water demand if they need it?)

Regarding the second element of bullet #1 (now bullet #2):  
"Improve the ability to transport water through the Bay/Delta system." This item could be read a number of ways; does it

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include outflow, or is the reference to exports. "Through" suggests only certain types/manner of routing and diversions.

What about in-delta diversions? Is there no reliability issue-- I think there is, especially in the context of water quality.

Water quality:

p. 6 Why is there a goal of "good" water quality for consumptive uses and "improved" water quality for environmental needs? "Improved" water quality could still fall short of "good" quality for the environment.

Between the problem statement (which is very general) and this purpose statement, there's little content here.

If there's a need for improvement relative to existing quality (versus "protection"), this should be specified in the need statement.

Does "provide good water quality..." mean protect existing quality? In particular, if there's concern over future declines below currently adequate levels (ie. protection but not improvement required), then the problems anticipated absent Program intervention should also be identified.

Are there additional situations in which quality needs to be improved (eg., certain recreational uses)?

What about improving water quality where there are public health concerns (consumption bans where contaminant concentrations are of concern)?

Last bullet is incoherent. Does it mean, "Provide improved Delta water quality for environmental needs"-- ? (See above re providing information on the underlying problems.)

System vulnerability:

What is the rationale for managing risk to the existing land use and Bay/Delta ecosystem (especially considering the fact that the Program itself is planning changes to improve ecosystem condition). (Does the Estuary program key only to existing uses and ecosystem conditions? do local plans?) It seems it would be better to relate flood risk management to land uses and ecosystem conditions consistent with the Program and related programs, recognizing that preservation of existing uses may not be desirable in some situations.

The distinction between the need to protect habitat for nonmigrating and migrating waterfowl makes little sense. Consider saying, this would be "loss of habitat for species, such as waterfowl and sandhill cranes, which use agricultural lands and freshwater wetlands on the interior of delta islands."